

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JANICE MCMONIGLE; AMBERLY
OGDEN; MOLLY SLIWINSKI; and
LAUREN WELLS,

On behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

BLACKOXYGEN ORGANICS USA,
INC.; and MARC SAINT-ONGE,

Defendants.

CIVIL ACTION NO:

1:21-cv-04790-LMM

DECLARATION UNDER PENALTY OF PERJURY OF LOUISE HARRIS

COMES NOW Louise Harris, under 28 U.S.C. § 1746, and certifies the
following:

1. I am a resident of the United Kingdom and suffering from no disability
preventing me from providing truthful information.
2. I served as a brand partner of Defendant BlackOxygen Organics USA,
Inc. from February 2021 until November 10, 2021.

3. While serving as a brand partner, I also worked in an untitled role supporting the customer service department under the supervision of corporate members of BlackOxygen Organics USA, Inc.
4. During the entirety of my time working with Defendant BlackOxygen, the retail price of BlackOxygen brand Tablets and Powders was at least \$95. There were instances where the product sold for as little as \$80 and as much as \$110, but those instances were brief and did not account for a meaningful volume of sales.
5. While working as a brand partner and in an untitled operational role, I was able to access, view, and work with various company documents.
6. From my personal knowledge, I can attest that the excel spreadsheet, titled “Sales Data” filed in support Plaintiffs’ Motion for Default Judgment in the above case as **Exhibit A**, was
 - a. made at or near the time by — or from information transmitted by — someone with knowledge of its contents;
 - b. was kept in the course of Defendant BlackOxygen’s regularly conducted business activity;
 - c. was made as a regular practice of Defendant BlackOxygen’s regularly conducted business activity;

- d. I am a qualified witness to attest that these conditions have been met; and
 - e. the opponent to this case has not shown that the source of information nor the method nor circumstances of this documents preparation indicate a lack of trustworthiness.
7. The spreadsheet contains personally identifiable information of all sales conducted from June 1, 2019, through November 19, 2021.
8. For the certified class period of November 19, 2019, through November 19, 2021, there were 62,051 customers who purchased a total of 91,095 units of Black Oxygen products.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 30th day of August, 2023.



Louise Harris